IN THE UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re:) Chapter: 13
) Case No. 24-11866

STEVEN FRANCIS CARR

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

Please take notice that the undersigned hereby enters his appearance as counsel for and on

behalf of Santander Consumer USA Inc. creditors in the above-captioned matter, and hereby requests, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Rules"); and, pursuant to Rules 2002 and 9001 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 342, that copies of all notices and pleadings given or filed in this case be given and served upon the party listed below at the following address and telephone number:

> William E. Craig, Esquire Eisenberg, Gold & Agrawal, P.C. 1040 N. Kings Highway, Suite 200 Cherry Hill, NJ 08034 Telephone: 856-330-6200

Facsimile: 856-330-6207 wcraig@egalawfirm.com

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceeding herein.

This Notice of Appearance and Request for Service of Papers, and any subsequent appearance, pleading, claim, or suit, shall not be deemed or construed to be a waiver of Santander Case 24-11866-amc Doc 22 Filed 08/26/24 Entered 08/26/24 13:15:39 Desc Main Document Page 2 of 2

Consumer USA Inc. right: (i) to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Santander Consumer USA Inc. is or may be entitled, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Santander Consumer USA Inc. expressly reserve.

Respectfully submitted,

EISENBERG, GOLD & AGRAWAL, P.C.

By: /s/ William E. Craig_

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Counsel to Santander Consumer USA Inc. dba Chrysler Capital as servicer for

CCAP Auto Lease

Dated: August 26, 2024